

United States District Court

for the

Eastern District of Washington

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Jul 09, 2019

SEAN F. McAVOY, CLERK

Petition for Warrant or Summons for Offender Under Supervision

Name of Offender: Joey Valentino Reyes Case Number: 0980 2:18CR00193-RMP-1

Address of Offender: Quincy, Washington 98848

Name of Sentencing Judicial Officer: The Honorable Alan B. Johnson, U.S. District Judge

Name of Supervising Judicial Officer: The Honorable Rosanna Malouf Peterson, U.S. District Judge

Date of Original Sentence: February 24, 2010

Original Offense: Conspiracy to Possess with intent to distribute and to distribute methamphetamine, 21 U.S.C. § 841(b)(1)(A) and 846
Possession of a Firearm in Furtherance of a Drug Trafficking Offense, 18 U.S.C. § 924(c)(1)(A)(I)

Original Sentence:	Prison - 211 months TSR - 60 months	Type of Supervision: Supervised Release
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Revocation sentence: Prison - 160 days
April 23, 2019 TSR - 54 months 20 days

Asst. U.S. Attorney: Troy J. Clements Date Supervision Commenced: May 22, 2019

Defense Attorney: Molly Marie Winston Date Supervision Expires: December 12, 2023

PETITIONING THE COURT

To issue a warrant.

The probation officer believes that the offender has violated the following condition(s) of supervision:

<u>Violation Number</u>	<u>Nature of Noncompliance</u>
1	1. The company failed to maintain accurate records of all transactions, including sales, purchases, and inventory levels.
2	2. The company failed to properly segregate duties, allowing one individual to handle both the recording and the custody of assets.
3	3. The company failed to conduct regular physical inventory counts to verify the accuracy of the recorded inventory levels.
4	4. The company failed to implement proper access controls, allowing unauthorized personnel to enter the warehouse and handle inventory.
5	5. The company failed to maintain proper documentation for all inventory movements, including receipts, invoices, and transfer orders.
6	6. The company failed to conduct regular reconciliations between the recorded inventory levels and the physical counts.
7	7. The company failed to implement proper segregation of duties between the purchasing and the receiving functions.
8	8. The company failed to maintain proper documentation for all purchases, including purchase orders, invoices, and receiving reports.
9	9. The company failed to conduct regular reconciliations between the recorded purchase amounts and the actual invoices received.
10	10. The company failed to implement proper access controls for the accounting system, allowing unauthorized personnel to view or modify financial data.
11	11. The company failed to conduct regular reconciliations between the recorded sales amounts and the actual cash receipts.
12	12. The company failed to implement proper segregation of duties between the sales and the cash handling functions.
13	13. The company failed to maintain proper documentation for all sales, including sales orders, invoices, and shipping documents.
14	14. The company failed to conduct regular reconciliations between the recorded sales amounts and the actual cash receipts.
15	15. The company failed to implement proper access controls for the inventory management system, allowing unauthorized personnel to view or modify inventory data.
16	16. The company failed to conduct regular reconciliations between the recorded inventory levels and the physical counts.
17	17. The company failed to implement proper segregation of duties between the purchasing and the receiving functions.
18	18. The company failed to maintain proper documentation for all purchases, including purchase orders, invoices, and receiving reports.
19	19. The company failed to conduct regular reconciliations between the recorded purchase amounts and the actual invoices received.
20	20. The company failed to implement proper access controls for the accounting system, allowing unauthorized personnel to view or modify financial data.

1 **Mandatory Condition # 3:** The defendant shall refrain from any unlawful use of a controlled substance. The defendant shall submit to one drug test within 15 days of release from imprisonment and at least two periodic drug tests thereafter, as directed by the probation officer.

Supporting Evidence: Mr. Reyes is alleged to have used methamphetamine on or about June 10, 2019.

On May 31, 2019, supervised release conditions were reviewed and signed by Mr. Reyes acknowledging his understanding of mandatory condition number 3, which prohibits him from using a controlled substance.

On June 12, 2019, this officer met with Mr. Reyes in the community to complete a home inspection and to collect a urine specimen for a drug screen. Mr. Reyes admitted to having

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used methamphetamine on or about June 10, 2019. Mr. Reyes signed the admission/denial form admitting to using the substance as indicated.

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Standard Condition # 13: You must follow the instructions of the probation officer related to the conditions of supervision.

Supporting Evidence: Mr. Reyes is alleged to have failed to follow the instructions of his probation officer by failing to attend the Sobriety Treatment Education Program (STEP) for observation on July 3, 2019.

On May 31, 2019, supervised release conditions were reviewed and signed by Mr. Reyes acknowledging his understanding of standard condition number 13, which requires him to follow instruction of his probation officer.

On June 19, 2019, this officer discussed enrolling in STEP with Mr. Reyes. Mr. Reyes agreed to enroll in the Yakima STEP program. He was advised the next STEP session was scheduled on July 3, 2019. Mr. Reyes agreed to attend an observation session then enroll in the program.

On June 26, 2019, this officer spoke with Mr. Reyes in regards to attending the STEP session on July 3, 2019, for observation. Mr. Reyes confirmed he would attend. On the morning of July 3, 2019, Mr. Reyes called and inquired about the time of the STEP session. Probation staff informed Mr. Reyes it was at 10:30 a.m. Mr. Reyes failed to attend the STEP session as directed. This officer attempted to reach Mr. Reyes on his last reported telephone number. The call went to an automated message which stated the voicemail system has not been set up yet.

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Standard Condition # 5: You must live at a place approved by the probation officer. If you plan to change where you live or anything about your living arrangements (such as the people you live with), you must notify the probation officer at least 10 days before the change. If notifying the probation officer in advance is not possible due to unanticipated circumstances, you must notify the probation officer within 72 hours of becoming aware of the change or expected change.

Supporting Evidence: Mr. Reyes is alleged to have failed to report a change of address to his probation officer as of July 2, 2019.

On May 31, 2019, supervised release conditions were reviewed and signed by Mr. Reyes acknowledging his understanding of standard condition number 5, which requires him to report a change of address to his probation officer.

Mr. Reyes reported he would be residing with his grandmother at 13290 Road M.5 North West, Quincy, Washington. On June 12, 2019, Mr. Reyes was directed to meet this officer at his reported release address. Upon arrival, Mr. Reyes did not have access to the locked gate at the entrance of the driveway. He was confronted in regards to him not living at this location. Mr. Reyes then confessed and admitted he had not been residing with his grandmother. Mr. Reyes then reported he would be living with his aunt located at 8524 State Route 281 North in Quincy, Washington. On July 2, 2019, this officer conducted a home visit to verify Mr. Reyes' reported address. This officer met with a family member who reported that Mr. Reyes does not reside at this address. Mr. Reyes has yet to report a valid release address to his probation officer.

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Special Condition # 2: You must undergo a substance abuse evaluation and, if indicated by a licensed/certified treatment provider, enter into and successfully complete an approved substance abuse treatment program, which could include inpatient treatment and aftercare upon further ordered of the court. You must contribute to the cost of treatment according to your ability to pay. You must allow full reciprocal disclosure between the supervising officer and treatment provider.

Supporting Evidence: Mr. Reyes is alleged to have failed to attend his drug and alcohol treatment sessions at Social Treatment Opportunity Programs (STOP) on June 26 and July 3, 2019.

On May 31, 2019, supervised release conditions were reviewed and signed by Mr. Reyes acknowledging his understanding of special condition number 2, which requires him to attend recommended substance treatment.

On June 11, 2019, Mr. Reyes completed a drug and alcohol assessment at STOP. It was recommended he participate in intensive outpatient treatment. Mr. Reyes enrolled in this treatment program on June 25, 2019. On July 8, 2019, this officer spoke with Mr. Reyes' drug and alcohol counselor who confirmed Mr. Reyes failed to attend treatment sessions on June 26 and July 3, 2019.

The U.S. Probation Office respectfully recommends the Court issue a warrant requiring the defendant to appear to answer to the allegation(s) contained in this petition.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 9, 2019

s/Jose Zepeda

Jose Zepeda

U.S. Probation Officer

THE COURT ORDERS

- ☐ No Action
☒ The Issuance of a Warrant
☐ The Issuance of a Summons
☐ Other



Signature of Judicial Officer

7/9/2019

Date